FACT SHEET

EXPLANATION OF SIGNIFICANT DIFFERENCES
CONTINENTAL STEEL SUPERFUND SITE
KOKOMO, HOWARD COUNTY, INDIANA
Interim Record Of Decision for
Operable Unit 5-A, Decontamination and Demolition
Main Plant Buildings (D&D)

I. YOU ARE INVITED TO A PUBLIC MEETING !

DATE: **November 14, 2001**

TIME: **7:00 p.m. until 9:00 p.m.**

Place: **Kokomo City Hall**
Ralph W. Neal Council Chambers
Kokomo, Indiana

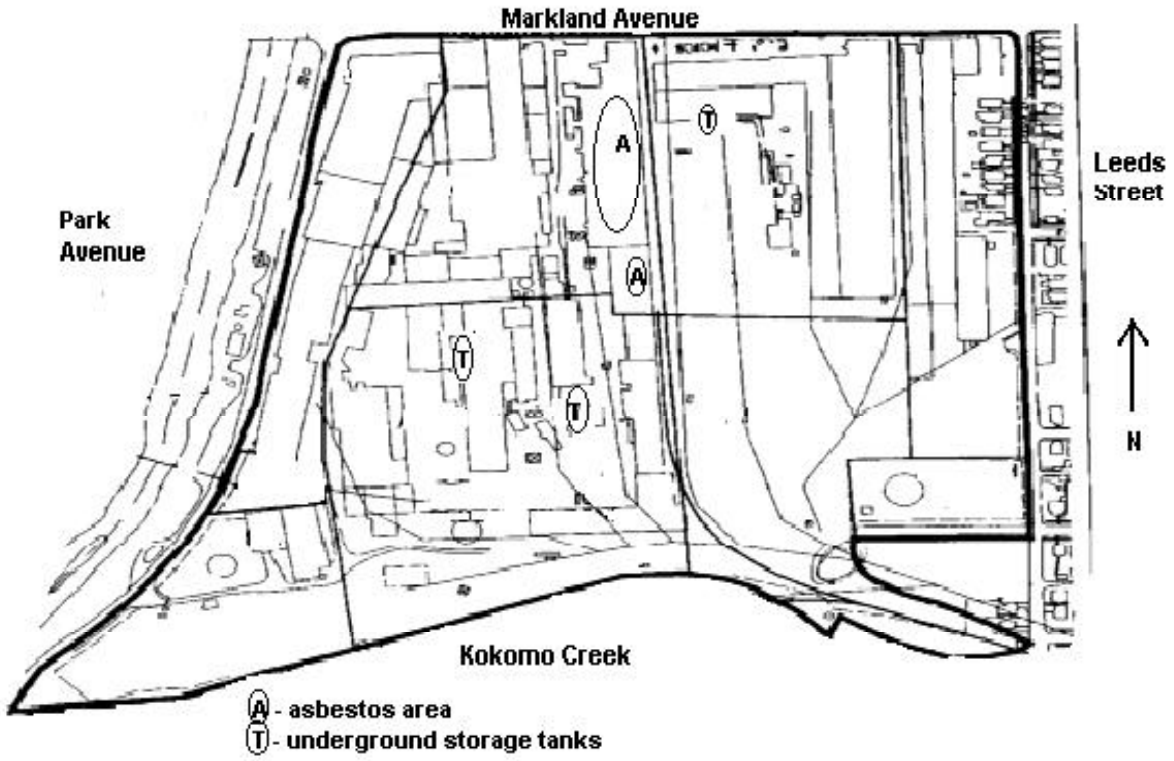
IDEM representatives will discuss site background, proposed changes to Interim Record of Decision and planned site activities. Oral and written comments will be taken on the proposed ESD at the public meeting.

The Indiana Department of Environmental Management (**IDEM**) invites the public to attend a meeting and to submit comments on the Explanation of Significant Differences (ESD) to the Interim Remedial Action for the **Continental Steel Superfund Site** (**CSSS**). The Interim Remedial Action was the **Decontamination and Demolition of Main Plant Buildings** (**D&D**) that was completed on December 28, 2000. This ESD is to explain the conditions and events that resulted in significant cost increases for the remedy and to provide information on newly identified site conditions that may effect the Final Remedy. The original IROD was presented to the public on February 28, 1996, and was signed September 30, 1996.

Oral and written comments will be taken on the proposed ESD at the public meeting. Written comments can also be mailed to IDEM before the end of the public comment period. The comment period begins on November 14, 2001 and ends on December 14, 2001.

First cut to a steel structure at Continental Steel Superfund Site, August 10, 1999.

Continental Steel Superfund Site
Operable Unit 5 - Main Plant



Contents of this Fact Sheet:

II. Introduction

The Explanation of Significant Differences (ESD) presented in this fact sheet outlines the conditions and events that resulted in cost increases to the Interim Remedy. This summary also presents newly identified site conditions that will make it necessary to consider a change to the Final Remedy and the cleanup alternatives considered by IDEM and the U.S. Environmental Protection Agency (EPA) to reduce risks to human health and the environment. This ESD is presented to meet the requirements of the **Comprehensive Environmental Response, Compensation and Liability Act (CERCLA),** Section 9617(c) and the **National Contingency Plan (NCP)** Section 300.435(c)(2)(ii). These laws require the State to publish an explanation when any remedial action is taken that differs in any significant respects from the final remedial action plan. IDEM is the lead agency for the Continental Steel Superfund Site and EPA is the support agency.

The evaluation criteria used by IDEM and EPA in making their recommendations have been included in this fact sheet. For more information, consult these documents that are available in the **public information repository (Repository)** at the Kokomo/Howard County Public Library:

- Interim Risk Assessment/Feasibility Study – Main Plant Buildings (February 1996);
- Remedial Investigation and Feasibility Study Reports;
- Interim Remedial Action Proposed Plan; and
- other related material.

Based on new information or public comments, IDEM and EPA may modify the ESD. Citizens are encouraged to read and comment on all technical reports and alternatives considered for this Interim Remedial Action. The ESD for the Interim Remedial Action for Operable Unit 5-A, Decontamination and Demolition of Main Plant Buildings (D&D), will become part of the Administrative Record for the Continental Steel Superfund site in accordance with the NCP Section 300.825(a)(2).

Site Location and Background

The Continental Steel Superfund Site is located on West Markland Avenue in Kokomo, Indiana. The total site covers approximately 183 acres and includes an abandoned steel manufacturing facility (Main Plant). The Main Plant consists of about 94 acres and is bordered by Markland Avenue on the north, Park Avenue on the west, Leeds Street on the east and Kokomo Creek on the south. It included abandoned buildings with floor areas ranging from 10,000 square feet to 400,000 square feet. Many buildings had basements, some of which were flooded with ground water. Underground sewers and utility lines are also located on-site. The site had been abandoned since 1986, so the buildings were deteriorated and the site was heavily overgrown with weeds and shrubs. The area surrounding the facility is mixed residential, commercial, and industrial use and is zoned for general use, except for the Main Plant, which has an industrial-use-only deed covenant.

Continental Steel was built in 1914. The plant produced nails, wire, and wire fence from scrap metal. Operations included reheating, casting, rolling, drawing, pickling, annealing, hot-dip galvanizing, tinning, and oil tempering. The steel manufacturing operations at the plant included the use, handling, treatment, storage, and disposal of hazardous materials. CSSS was operated from approximately 1914 to 1986, when the company entered into bankruptcy. It was placed on the National Priorities List (Superfund list) in 1989. There are no viable Potentially Responsible Parties, so the remedy is being funded by the Superfund Trust Fund through EPA with a 10% cost share being paid from the Indiana Hazardous Substances Trust Fund by the State of Indiana.

EPA Removal Actions

EPA began removal actions at the Main Plant and Markland Avenue Quarry in February of 1990. Drums at the quarry and Main Plant were collected, staged, analyzed, and disposed. Capacitors and transformers were removed. Some tank liquids were analyzed and disposed, and seven underground storage tanks were removed. Various chemicals were also removed from a laboratory facility at the Main Plant. Surface soil contaminated with Poly Chlorinated Biphenyls (PCBs) was removed from the former drum staging area at the quarry. Surface drums were over-packed, sampled, and disposed. A berm was also constructed. In May of 1990, EPA staged and sampled many drums at the Main Plant. Tank content samples were

collected and the liquids removed and disposed. Capacitor and transformer oils were analyzed, drained and disposed.

In August of 1993, the Main Plant area was sampled for PCBs, polycyclic aromatic hydrocarbons (PAHs), asbestos and lead. Approximately 90 cubic yards of lead-contaminated dust were consolidated, containerized, and stored on-site. Lead-contaminated debris was separated, stockpiled and covered for future disposal. Lead was removed from several of the buildings. Asbestos presence was confirmed in the buildings. EPA sampled sewers and drained the acid from tank T-18. The acid was disposed off-site. In October of 1993, one cubic yard of PCB-contaminated soil was excavated from the western portion of the Main Plant and disposed off-site. Various drums collected throughout the site from previous removal efforts were disposed off-site. In the fall of 1994, EPA removed contents and cleaned above ground storage tanks numbered T-1, T-2, T-20, T-21. Tanks T-14 and T-15 were emptied but not cleaned.

IDEM Investigation and Cleanup Actions – Description of Interim Remedial Action

IDEM performed an investigation of the Main Plant Area in 1995. The investigation identified concerns that the presence of the buildings presented a potential risk to nearby residents and trespassers. As a result, an Interim Risk Assessment/Feasibility Study – Main Plant Buildings was performed in 1996 and an Interim Proposed Plan was developed. The Interim Proposed Plan recommended that the buildings be decontaminated and demolished. Four alternatives were presented for consideration. They were:

- Alternative 1 - No Action
- Alternative 2 - Immediate Decontamination and Demolition of the Buildings
- Alternative 3 - Immediate Decontamination of the Buildings
- Alternative 4 - Securing the Buildings.

The proposed plan was presented to the public in March of 1996, and signed in September of 1996. Alternative 2 – Immediate Decontamination and Demolition of the Main Plant Buildings was the chosen alternative. Removal of the building structures would likely be required prior to remediation of contaminated soil that was detected during the investigation. The presence of the structures would make the remediation of the soil more difficult or impracticable. Considering the poor physical condition of some of the structures, it would be impracticable to underpin or partially demolish a structure to gain access to soils beneath the structure. As buildings continued to deteriorate, the potential for the contaminants inside to be released and migrate off-site would increase. Therefore, a greater potential for additional risks to human health and the environment would be created. The major components of the selected interim remedy included:

- Gross removal of lead dust from contaminated building interiors using vacuuming and/or pressure washing with disposal of dust as hazardous waste in a permitted facility;
- Management and proper disposal of rinse water collected from decontamination. Rinse water would be managed as hazardous waste until receipt of waste characterization analyses;
- Abatement of exposed friable asbestos-containing material and asbestos-containing insulation by removal and disposal at a permitted facility;
- Sampling to confirm decontamination;
- Removal of PCB-contaminated wood block floors and disposal as hazardous waste;
- Demolition of all building superstructures, tanks, and equipment to grade, leaving floor slabs;
- Salvaging of structural steel as scrap unless it could be decontaminated and reused as originally intended;
- Disposal of all debris and demolition rubble as hazardous, special or non-hazardous waste as determined by waste characterization;
- Use of water spray for dust control during demolition. Dust control water runoff would be contained and managed properly to prevent the transport of contaminants from the immediate demolition site;
- Pumping out flooded basements, removal of equipment and residue from basement, and filling of basements. The pumped water would be managed as hazardous waste until receipt of waste characterization analyses;
- Filling or covering of pits;
- Finishing of unpaved areas with crushed stone; and
- Securing of the site after the interim remedy was completed.

The work began with an asbestos survey in April of 1999 and was completed on December 28, 2000.

Summary of Site Risks

Based on the information available regarding the contamination on-site, the Main Plant source area posed a significant health hazard. Dust known to contain lead and other metals was present on-site and could potentially migrate off-site to the nearby residential area. The contaminants of concern are:

- metals and arsenic;
- polycyclic aromatic hydrocarbons (PAHs);
- polychlorinated biphenyls (PCBs); and
- asbestos.

The dust contained the highest concentration of metals at the site. The potential for off-site migration of contaminated dust increased as the buildings continued to deteriorate. Dust had been observed in surface soil outside of the buildings. Also, the high concentrations of contaminants on-site (such as metals and PCBs) and the potential for "friable" asbestos to release "respirable" asbestos fibers made potential exposures for workers and trespassers on-site significant. *(See Glossary for explanation of the words "friable" and "respirable.)* Wastes in drums or piles on-site were also a potential source of contamination to human and environmental receptors. Physical hazards were posed by the poor structural integrity of the buildings, the flooded basements and easy access to the site. The site was an attractive nuisance and trespassers were frequently noted. The population at risk included children and young adults trespassing on-site, residents living near the site, users of West Markland Avenue, South Park Avenue and South Leeds Street, and emergency responders such as police, fire and rescue personnel.

Installation of truck scales to weigh loads of scrap steel and waste.

III. Summary of Cost Increases for Interim Remedy

When there are significant changes to a remedy, or a significant change in the cost of a remedy, an "Explanation of Significant Differences" must be presented in the same manner as in the original ROD. The information in this ESD does not describe a change to the remedy, it explains the reasons for a significant increase to the cost of the Interim Remedy, and describes newly discovered site conditions that possibly will require a change to the Final Remedial Action.

The D&D was performed under a contract between the State of Indiana and IT Corporation. The estimated cost of the D&D determined by the Interim Risk Assessment/Feasibility Study was $8.2 million. The price of the contract to perform the work, executed December 10, 1998, was $9,692,932. The contract contained many tasks that would be paid on a lump sum basis. Some tasks, such as waste disposal and asbestos abatement, were to be paid on the basis of a unit rate (such as per pound or per cubic yard). The contract included an estimate of the number of units. The actual cost of the task could change if the number of units was more or less than the estimated amount.

The cost of the D&D increased because, in many cases, the volumes encountered were greater than the estimated amounts. New tasks were also identified that needed to be completed in order to meet the objectives of the Interim Remedy. Nine new categories of asbestos-containing material, with associated unit rates and estimated quantities, were added to the contract. The first amendment increased the contract price to $20,128,992. Unforeseen types and quantities of asbestos continued to be encountered. A second amendment to the contract increased the price to $25,113,241. A third amendment increased the price to $30,113,241. The cost increases are explained below.

On-Site Wastewater Treatment

The contract price included storage, handling and disposal of wastewater that was collected or generated at the site. The City of Kokomo had agreed to accept the wastewater at no cost. However, it was not lawful or advisable to send wastewater from the site to the Kokomo Municipal Wastewater Treatment Facility. CERCLA section 9621(d)(3) requires that:

> *In the case of any removal or remedial action involving the transfer of any hazardous substance or pollutant or contaminant, such hazardous substance, pollutant or contaminant shall only be transferred to a facility which is operating in compliance with section 3004 and 3005 of the Solid Waste Disposal Act (42 U.S.C. 6924, 6935) or, where applicable, in compliance with the Toxic Substances Control Act (15 U.S.C. 2601 et seq.), or other applicable Federal law and all applicable State requirements. Such substance or pollutant or contaminant may be transferred to a land disposal facility only if the President determines that both of the following requirements are met:*
>
> *(A) The unit to which the hazardous substance, pollutant or contaminant is transferred is not releasing any hazardous waste, or constituent thereof , into the groundwater or surface water or soil.*
> *(B) All such releases from other units at the facility are being controlled by a corrective action program approved by the Administrator under Subtitle C of the Solid Waste Disposal Act (42 U.S. C. 6921 et seq.). The President shall notify the owner or operator of such facility of determination under this paragraph.*

The Kokomo Municipal Wastewater Treatment Facility was not in full compliance with its Operating Permit or Agreed Order B1405, which was effective in 1992. The City of Kokomo was taking corrective steps to make the necessary improvements, and the plant met interim limits set out in an Agreed Order, however, it was not capable of meeting the metals limits in its Operating Permit. The plant also had problems with wet weather bypasses, during which wastewater is not treated.

To provide for proper treatment and disposal of wastewater from CSSS, an on-site wastewater treatment plant was constructed in accordance with the requirements of the State of Indiana National Pollutant Discharge Elimination System (NPDES) permit program. Construction of this facility added $122,500. The additional cost of on-site treatment was $0.182 per gallon.

Truck Scales

Construction and operation of truck scales was added to the contract to allow waste and scrap metal to be weighed before leaving the site. This was included to provide a means to verify the disposal costs and scrap metal receipts. The estimated cost to acquire the scales and a thirteen months lease was $75,900. That included the initial fee of $4,400, and a monthly lease charge of $5,500. The scales were installed in January 2000 and leased from February 2000 through December 29, 2000. The scales were acquired on a lease-to-own basis , therefore, they became the property of the State of Indiana at the end of the lease, and will remain on the site for use during future remedial activities. The final cost was $64,900.

Asbestos Abatement

The largest increase in cost, approximately $18 million, was due to the presence of unforeseen types and quantities of asbestos-containing material (ACM) on the site. An initial visual asbestos inspection in January of 1997 identified several kinds of suspected ACM and estimated quantities of each. No samples were taken. Some materials were noted as potentially containing asbestos, but were not included in the estimate because of the lack of analytical information. The information from this inspection was used to develop the categories of asbestos and estimated quantities that were in the original contract. The first activity of the D&D was an asbestos survey that began in April 1999. Samples were taken of all materials that were located that could potentially contain asbestos. This survey attempted to determine the actual quantities of the asbestos.

Both the asbestos inspection and the asbestos survey were performed under adverse conditions. There was no power supply to the site, so they were performed with limited artificial light supplied by flashlights, and little or no natural light. Hazards were present in the form of debris, pits, trenches and other openings in the floors. Some upper floors were inaccessible due to unsafe conditions, and basements were completely inaccessible due to flooded

conditions. The inspection and the survey were complicated by adverse weather and the personal protective clothing and respirators needed due to the presence of friable asbestos and other hazardous contaminants. In addition, as the buildings were demolished, new types of asbestos were discovered on the insides of walls, in tunnels, trenches and basements, and enclosed in pieces of equipment.

Bonds

The cost of bonding the project increased when the first amendment to the contract raised the contract price to $20,128,992. The amount of this increase was $204,192.

Increased Volumes of Hazardous and Non-Hazardous Wastes

The contract contained assumptions about the quantities and types of wastes that would be encountered. The handling and disposal of all wastes included in those assumptions were paid on a lump sum basis. Two types of increases were experienced with regard to waste disposal. First, wastes that were included under existing categories were found at volumes that exceeded the assumed volumes in the contract. New unit rates were established to handle and dispose of the volumes over and above what was included in the lump sum. Second, several types of waste were found that were not included in the existing categories. A new unit rate was established to handle and dispose of each new waste type. Those wastes included the following:

Mixed Waste Tote Bags. During the EPA-lead Immediate Removal Action, dusts from highly contaminated areas throughout the site were collected into tote bags. The tote bags were labeled to indicate the contaminants inside and the area of the Main Plant site from which the dust was collected. Many of the tote bags were marked with the label "HLL," indicating that EPA had sampled the waste in the bags and determined that the bags contained dust with high levels of lead. These bags were to be properly disposed during the Final Remedial Action. IDEM disposed of the tote bags during the D&D. The dust in the bags was sampled for disposal. The dust in twenty-six of the bags was also contaminated with PCBs. These "mixed wastes" (wastes that contain both heavy metals and PCBs) had to meet stricter disposal requirements, resulting in an additional cost for disposal of $45,808.

Electric Arc Furnace Emissions Control Dust. The Continental Steel Main Plant included an Electric Arc Furnace and an associated air emissions filtration system (commonly known as a baghouse.) This system collected metals such as lead, cadmium, and chromium to prevent them from being released into the air from the stack. The collected dust was a hazardous waste. The system had to be cleaned before demolition to prevent the dust from being released into the air. The amount of dust estimated to be present within the system was 20 cubic yards. The actual volume of dust present in the baghouses, blowers, and ductwork was 600 cubic yards. The additional cost to clean the system and dispose of the dust was $198,742.

PCB Wood Block Flooring. The contract assumed that the wood block floors would be non-hazardous. Analytical results identified the presence of regulated levels of PCBs. A unit price of $185 per cubic yard was established. The final cost for disposal of this material was $16,835.

Mixed Waste Debris. Debris from a pile in Building 71B contained PCBs and metals at regulated levels. The handling and disposal methods for debris differ from those for dust, making it necessary to dispose of it differently from the other mixed waste (dust) on the site. A unit rate of $535 per cubic yard was established. The handling and disposal cost was $35,845.

PCB Transformers. The contract assumed that there would be 40,000 pounds of waste from PCB transformers and capacitors. The first 40,000 pounds were included in the lump sum for demolition. That amount was exceeded. A new unit rate of $0.45 per pound was established for the additional volume. The cost to handle and dispose of the additional waste was $87,794.

PCB Contaminated Concrete and Foundry Sand. The concrete slabs of two buildings, Building 112 and Building 71B, were contaminated with PCBs. Foundry sand that was located in Building 125 also contained regulated levels of PCBs. A new unit rate of $300 per ton was established for the concrete and the foundry sand. The final cost for disposal of these materials was $681,696.

Flammable Liquids and PCB-Contaminated Flammable Liquids. The contract did not include waste that was hazardous due to the

characteristic of ignitability. Two types of flammable liquids were identified; flammable liquids and flammable liquids containing PCBs. Flammable liquids were disposed at a unit rate of $1.70 per pound for a total cost of $13,770. Flammable liquids contaminated with PCBs were disposed of at a rate of $2.10 per pound for a total cost of $19,866.

Solid Non-Hazardous Waste. The contract assumed 1000 tons of solid non-hazardous waste. That amount was included in the lump sum cost for demolition and disposal. For the amount of solid non-hazardous waste materials over 1000 tons a unit rate of $50 per ton was established. The total cost for handling and disposal of this material was $90,042.

Basement Remediation. Building 110, the former Rod Mill, had a full basement. The basement was flooded prior to the D&D project. Since the conditions could not be observed, cleanup work was not included in the scope of the contract. When the water was pumped from the basement it was found that the entire western half of the basement contained a layer of oil and sludge approximately eighteen inches deep, and that extensive cleaning would be necessary to remove the oil, sludge and debris. All of the piping, debris and equipment were removed and cleaned as needed for disposal. The oil and sludge was removed with pumps and shovels, the walls and floors were steam-cleaned. The cleaning was performed for a lump sum cost of $223,000.

Sludge and Solids in Containers. This waste was the product of the cleanup of the basement of Building 110, and was not included in the contract. A unit rate of $80.00 per drum was established, for a total cost of $8,160.

IV. Newly Identified Site Conditions

Temporary In-Place Containment of Asbestos Containing Material (ACM)

The IROD included abatement of exposed friable ACM. An unknown volume of ACM remains below grade at the Main Plant area. The ACM is the brick walls of tunnels constructed with an asbestos-containing mortar. The tunnels are located under the former Open Hearth Furnace Building, Building No.5. ACM was also found below grade in Building 40. Much of this material was excavated and landfilled. It was determined that the remainder of the below grade material would not be exposed, but would be left in place. The reasons were as follows:

- The high cost of excavation and disposal - the estimated cost to excavate all of the ACM in the tunnel system was $2 million;
- the existence of lead-contaminated soil in an adjacent area; and
- the extent of the ACM was unknown.

In order to prevent the release of asbestos fibers into the air, it was necessary to immediately contain the ACM. Some ACM had been excavated, but had not been disposed. This was placed back into the pits created during excavation. The area was covered with two feet of cover material and fill material was added to make a smooth grade. A four-foot chain link fence was installed along the top of a wall adjacent to the containment area to prevent accidents and injury to trespassers. The final cost of this action was $39,072.50. The cost to apply two feet of cover material and additional common fill to establish the grade was approximately $6,455.

Asbestos-containing rubble, Open Hearth Furnace Building, that was removed from site.

The temporary containment was an immediate response to newly identified site conditions.

Neither the IROD nor the Final ROD addressed the presence of asbestos below the ground surface. The on-site containment is only a temporary measure. The containment controls

risk to human health and the environment because it will prevent the asbestos from migrating from the site and prevent any exposure to the material. However, alternatives for final disposal must be evaluated to determine whether a change is necessary to the Final Remedial Action. The City of Kokomo has received a Redevelopment Grant from EPA to develop a re-use plan for this area. Re-use would be impacted by the presence of asbestos below the ground that would effect excavation in the area. Although asbestos may be removed in the future, it would need to be done in accordance with environmental laws. Alternatives for the final cleanup to address the underground ACM will be developed during the Remedial Design for the Final Remedial Action at the CSSS. The alternatives will be presented to the public in a Proposed Plan for an Amendment of the ROD for the Final Remedial Action.

Interior of Building after pre-cleaning

Underground Oil Storage Tanks

Underground storage tanks were found in three locations on the Main Plant property. This remedy did not include below-ground excavation of any structures or remediation of contaminated soil. The existence of these tanks had not been documented in the previous investigations. The first group of tanks is between former buildings 21, 22 and 24. The second is in a raised area south of former Building 1. The third area, containing only one tank, is under former Building 125. The tanks were sampled and were determined to contain oil with no hazardous substances. Since the contents consist of oil for consumptive use on the site (fuel oil for boilers and furnaces) the tanks are not regulated. The locations of the tanks were recorded and are included in the survey of underground structures. The tanks in the first two locations were covered with visqueen secured with crushed concrete. There is no access from the ground level to the tank at the third location, and that excavation was re-closed.

V. The Next Step

IDEM will accept comments from the community during the public comment period from November 14, 2001 to December 14 2001. Comments can be sent directly to IDEM, or made verbally at the public meeting to be held November 14, 2001. IDEM, in consultation with EPA, will consider public comments received during the public comment period. Proposed cleanup decisions have been changed in the past based upon public comment. The interim remedial action selected by IDEM will be described in the ESD. A summary of all comments and IDEM's responses will be contained in the Responsiveness Summary section of the ESD, which will be available at the information repository when finalized.

View of site from Community Relations Observation Deck prior to demolition.

VI. Glossary

Administrative Record - A compilation of documents that IDEM either considered or relied upon in selecting remedial or removal actions to be taken at a Superfund site.

ARARs (Applicable or Relevant and Appropriate Requirements) – Those cleanup standards, standards of control, and other substantive environmental protection requirements, criteria, or limitations promulgated under federal or state law that specifically address a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance at a CERCLA site, or that address problems or situations sufficiently similar to those encountered at the CERCLA site that their use is well-suited to the particular site.

Asbestos – A mineral suitable for use as a noncombustible, nonconducting or chemically resistant material, that readily separates into long flexible fibers. Asbestos is known to cause cancer and other health-related problems in humans. The word **"friable"** means asbestos that can release fibers into the air. **"Respirable"** fibers are fibers small enough to be breathed into the lungs.

Lump Sum – Term used when work is paid for on the basis of a defined task.

PCBs – (Polychlorinated Biphenyls) – a group of toxic, persistent chemicals used in transformers and capacitors for insulating purposes and in gas pipeline systems as a lubricant. Further sale and new use were banned by law in 1979.

PAHs (Polycyclic Aromatic Hydrocarbons) – A group of persistent chemicals formed during the incomplete burning of coal, oil, gas, refuse, or other organic substances.

RI/FS (Remedial Investigation/Feasibility Study) – Two distinct but related studies. They are usually performed at the same time, and together referred to as the "RI/FS." They are intended to (1) gather the data necessary to determine that type and extent of contamination at a Superfund site; (2) establish criteria for cleaning up the site; (3) identify and screen cleanup alternatives for remedial action; and (4) analyze in detail the technology and costs of the alternatives.

Risk Assessment – An evaluation of the extent of contamination and the current and potential risk to human health and the environment.

ROD (Record of Decision) – A legal document that explains which cleanup alternative(s) will be used to cleanup Superfund remedial sites. The Record of Decision is based on information and technical analysis generated during the remedial investigation/feasibility study (RI/FS) and consideration of public comments and community concerns.

Superfund – The common name used for the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) as amended by the Superfund Amendments and Re-authorization Act (SARA) of 1986. Superfund authorizes the federal government to respond directly to releases, or threatened releases, of hazardous substances that may endanger public health and welfare, or the environment.

Unit Rate – Term used when work is paid for based on a price per a unit, such as a ton, pound or yard.

VII. Additional Information

Anyone interested in learning more about the Remedial Investigation, the Interim Remedy ESD for addressing contamination contained in the Main Plant buildings or the Superfund process is encouraged to review the Interim Remedy Risk Assessment/Feasibility Study – Main Plant Buildings and other documents related to the site. An administrative record, including the information IDEM relied upon to choose the recommended alternative is also available in the **Information Repository** located at:

Information Repository
Kokomo/Howard County Public Library
Reference Section
220 North Union Street
Kokomo, IN

A copy of this information is also kept in the IDEM public file room which is located at:
Indiana Government Center – North
Room N-1255
100 North Senate Avenue
Indianapolis, IN 46204

This steam whistle that was on the roof of the Open Hearth Furnace Building is now at Kokomo High School to be preserved and displayed.

For further information, please contact:
Pat Likins, Project Manager
Office of Land Quality
100 North Senate Avenue IGC-N
P.O. Box 6015
Indianapolis, IN 46206-6015
(317) 234-0357
IDEM's toll-free number: 1-800-451-6027

Media inquiries should be directed to:
Susan Gross, Coordinator
Office of Media and Communication Services
100 North Senate Avenue IGC-N
P.O. Box 6015
Indianapolis, IN 46206-6015
IDEM's toll-free number: 1-800-451-6027

ADA Information
Individuals requiring reasonable accommodations for participation at the public meeting should contact the IDEM Americans with Disabilities Act coordinator at:

ATTN: Carla Poe, ADA Coordinator
Indiana Department of Environmental Management
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

Or call (317) 233-0544(V) or (317) 233-6087(TT)
Please provide a minimum of 72 hours notification.

Bulking liquid and powerwashing drums. The steel drums were recycled.

USE THIS SPACE TO WRITE YOUR COMMENTS

Your input on the Explanation of Significant Differences to the Interim Remedy at the Continental Steel Superfund Site is important to us.

You may use the space below to write your comments. This form may then be folded with the address on the outside and mailed. Comments must be postmarked by December 14 2001. If you have any questions, please contact Ms. Pat Likins at (317) 234-0357 or the toll-free number 1-800-451-6027.

Name_____

Address_____

City_____

State_____Zip_____

Phone (____)_____

Name_____ Please
Address_____ place
City_____ stamp
State/Zip_____ here

MS. PAT LIKINS, PROJECT MANAGER
FEDERAL PROGRAMS SECTION
OFFICE OF LAND QUALITY
INDIANA GOVERNMENT CENTER – NORTH, ROOM 11—
P.O. BOX 6015
INDIANAPOLIS, IN 46206-6015

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